

Exhibit C

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No. 4 of the Parx Subpoena, Parx does not have responsive documents in its possession. *See Bonner Decl.* ¶ 11, at 2. These five emails dated February 19 and 21, 2020, are all privileged. They are identified in the log submitted by Eckert with its motion. *See Bonner Decl.* ¶ 14, at 2.

In addition, Parx discovered several internal emails in which Parx's Chief Counsel informed the board and management about this litigation and discussed it with Parx's CFO after forwarding him a copy of the complaint filed by POM that Parx received from Eckert. These emails are also privileged and listed in the privilege log embedded below.

Date	Subject Line	Subject Matter	Sender	Sender's Title	Recipient(s)	Recipient(s)'s Title(s)	Privilege
2/19/2020 @ 6:20 PM EST	FW: Lawsuit filed by Pace-O-Matic	Forwarding complaint; summarizing contents	Thomas C. Bonner	Chief Counsel	Members of the Board; Officers; Management; Board Advisors and Board Representatives	Chairman; Board of Directors, CEO, CFO, COO, Group VPs, Legal and Financial Advisors	Attorney-Client; Work-Product
2/21/2020 @ 2:57:47 PM EST	FW: [External] POM v ESCM	Forwarding complaint; discussing contents	Thomas C. Bonner	Chief Counsel	Bryan Bartlett	Chief Financial Officer	Attorney-Client; Work-Product
2/21/2020 @ 3:02:17 PM EST	RE: [External] POM v ESCM	Discussing contents of complaint	Bryan Bartlett	Chief Financial Officer	Thomas C. Bonner	Chief Counsel	Attorney-Client; Work-Product
2/21/2020 @ 3:04:18 PM EST	RE: [External] POM v ESCM	Discussing contents of complaint	Thomas C. Bonner	Chief Counsel	Bryan Bartlett	Chief Financial Officer	Attorney-Client; Work-Product

Accordingly, although Parx submits that documents regarding conflicts, waivers, concurrent representation, or withdrawal from representation are privileged and protected from disclosure for the